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6 *Attorneys for Defendant*  
7 *NETFLIX, INC.*

8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **OAKLAND DIVISION**

11 LAURI VALJAKKA,  
12 *Plaintiff,*  
13 v.  
14 NETFLIX, INC.,  
15 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF ELISE EDLIN IN  
SUPPORT OF DEFENDANT NETFLIX,  
INC.'S MOTION FOR AN ORDER TO  
SHOW CAUSE AND SANCTIONS  
AGAINST PLAINTIFF'S FORMER  
ATTORNEY, WILLIAM RAMEY AND  
RAMEY LLP**

Judge: Hon. Jon S. Tigar  
Hearing Date: May 8, 2025  
Time: 2:00 p.m.

1 I, Elise Edlin, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in San Francisco,  
3 California, and counsel representing Defendant Netflix, Inc. (“Netflix”). I have personal  
4 knowledge of the facts set forth in this declaration and am competent to testify.

5 2. I am submitting this declaration in support of the Defendant Netflix, Inc.’s Order to  
6 Show Cause and Sanctions Against Plaintiff’s Former Attorney William Ramey and Ramey LLP.

7 3. Attached hereto as Exhibit A is a true and correct copy of the protective order  
8 entered in this case on July 25, 2022, ECF No. 56 (“Protective Order”).

9 4. Attached hereto as Exhibit B is a true and correct copy of the July 27, 2023 Order  
10 on the parties’ Stipulation Amending Protective Order, ECF No. 120.

11 5. Throughout the litigation, Netflix produced thirty-nine documents under the case  
12 Protective Order’s CONFIDENTIAL or HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES  
13 ONLY (“AEO”) designations. The protected information in these documents describes the  
14 technical operation of the accused products and services, detailed non-public financial data for  
15 many years of Netflix’s business, and Netflix’s license agreements with third parties, among other  
16 things. Netflix also made its source code available for inspection its source code pursuant to the  
17 protective order’s HIGHLY CONFIDENTIAL – SOURCE CODE protections. Netflix did not  
18 produce or make available for inspection to AiPi any of its protected materials.

19 6. Netflix subpoenaed AiPi, LLC (“AiPi”) for documents related to Netflix’s claims in  
20 this court under the California Uniform Voidable Transactions Act (“CUVTA”) (“AiPi  
21 Subpoena”). Netflix is currently enforcing the subpoena in *AiPi LLC v. Netflix Inc.*, No. 24-mc-  
22 00002 (E.D.Va.) (“Virginia Enforcement Case”). AiPi has been ordered to provide a full and  
23 complete production of documents responsive to the AiPi Subpoena. Attached as Exhibit C is a  
24 true and correct copy of Netflix’s Motion for Contempt of Order Compelling Production against  
25 AiPi in the Virginia Enforcement Case, ECF No. 63-1. Attached as Exhibit D is a true and correct  
26 copy of the court’s order on Netflix’s motion for contempt in the Virginia Enforcement Case, ECF  
27 No. 65.

1           7.       Attached hereto as Exhibit E is a true and correct copy of the public (redacted)  
2 version of the Engagement Agreement between AiPi, LLC and Ramey & Schwaller, LLP, dated  
3 October 1, 2021, and filed in the Virginia Enforcement Case, ECF No. 63-4. An unredacted version  
4 of the document was produced by AiPi pursuant to the AiPi Subpoena. The exhibit cover page  
5 from the original filing has been removed to avoid confusion.

6           8.       Attached hereto as Exhibit F is a true and correct copy of the public (redacted)  
7 version of a document entitled “Litigation Plan for Lauri Valjakka,” dated August 19, 2021, and  
8 filed in the Virginia Enforcement Case, ECF No. 63-5. An unredacted version of the document  
9 was produced by AiPi pursuant to the AiPi Subpoena. The exhibit cover page from the original  
10 filing has been removed to avoid confusion.

11          9.       Attached hereto as Exhibit G is a true and correct copy of the July 22, 2024  
12 Declaration of Eric Morehouse, filed in the Virginia Enforcement Case, ECF No. 17-2.

13          10.       Attached hereto as Exhibit H is a true and correct copy of the Reply Brief in Support  
14 of AiPi, LLC’s Motion to Quash Subpoena, filed in the Virginia Enforcement Case, ECF No. 24.

15          11.       Attached hereto as Exhibit I is a true and correct copy of an email from William  
16 Ramey to Eric Lund and Eric Morehouse of AiPi, dated January 6, 2023, and filed in the Virginia  
17 Enforcement Case, ECF No. 63-7. A copy of this email was produced by AiPi pursuant to the AiPi  
18 Subpoena with its attachment, a copy of NFX\_VALJ-00007111, which is a spreadsheet produced  
19 by Netflix and designated AEO under the Protective Order. The spreadsheet is a “master” financial  
20 report containing over seven years of detailed, non-public, profit and loss information across  
21 Netflix’s various business lines and units. The exhibit cover page from the original filing has been  
22 removed to avoid confusion.

23          12.       Attached hereto as Exhibit J is a true and correct copy of an email chain among  
24 William Ramey, Eric Lund, Eric Morehouse, Ken Sheets, and Tina Hueske (Litigation Paralegal at  
25 Ramey LLP), dated between December 12 and 23, 2022. The email was produced by AiPi pursuant  
26 to the AiPi Subpoena and designated CONFIDENTIAL under the Protective Order. By December  
27 12, 2023, Netflix had already produced sixteen documents designated CONFIDENTIAL or AEO  
28

1 documents under the Protective Order. One of those documents was NFX\_VALJ\_00006545,  
2 which was produced by Netflix and designated AEO.

3 13. Attached hereto as Exhibit K is a true and correct copy of an email chain among  
4 William Ramey, Eric Lund, Eric Morehouse, and Ken Sheets, dated December 30, 2022. The email  
5 and attachments were produced by AiPi pursuant to the AiPi Subpoena and designated  
6 CONFIDENTIAL under the Protective Order. On December 30, 2022, Plaintiff Valjakka served  
7 supplemental infringement contentions that enclosed three Netflix technical documents produced  
8 AEO and discussed the contents of those documents.

9 14. Attached hereto as Exhibit L is a true and correct copy of an email from William  
10 Ramey to Eric Morehouse, Eric Lund, Ken Sheets, and Kyril Talanov (of Ramey LLP), dated July  
11 5, 2022, forwarding an email from Jack Lu to William Ramey, Kyril Talanov, Eric Morehouse,  
12 and others, also dated July 5, 2022. The forwarded email attaches a draft of the expert report of  
13 Robert Held regarding damages (Mr. Held was Mr. Valjakka's damages expert), and draft exhibits  
14 thereto. The draft report and draft exhibits discuss and reproduce financial data and license  
15 agreements of Netflix that it produced as AEO. The email and attachments were produced by AiPi  
16 pursuant to the AiPi Subpoena and designated CONFIDENTIAL under the Protective Order.

17 15. Attached hereto as Exhibit M is a true and correct copy of an email chain among  
18 William Ramey, Eric Morehouse and Ken Sheets, dated August 26 through September 1, 2022.  
19 The top email (from Mr. Ramey) attaches draft "revised damages contentions" and exhibits. The  
20 email and attachments were produced by AiPi pursuant to the AiPi Subpoena and designated  
21 CONFIDENTIAL under the Protective Order. The draft includes a description of financial data  
22 and license agreements of Netflix that it produced as AEO.

23 16. Attached hereto as Exhibit N is a true and correct copy of an email chain among  
24 William Ramey and Eric Morehouse, with earlier emails also including Craig Rosenberg, dated  
25 between June 2 and June 27, 2023. The email and attachments were produced by AiPi pursuant to  
26 the AiPi Subpoena and designated CONFIDENTIAL under the Protective Order.

27 17. Attached hereto as Exhibit O is a true and correct copy of an email from William  
28 Ramey to Eric Morehouse, Eric Lund, Ken Sheets, Kyril Talanov, and Susan Kalra (of Mahamedi

1 IP) dated May 16, 2023, forwarding an email from William Ramey to counsel for Netflix. The  
2 email and attachments were produced by AiPi pursuant to the AiPi Subpoena and designated  
3 CONFIDENTIAL under the Protective Order.

4 18. Attached hereto as Exhibit P is a true and correct copy of an email chain among  
5 counsel for Netflix and William Ramey dated between December 30 and February 5, 2025. This  
6 correspondence reflects Netflix's efforts through February 5, 2025 to secure compliance with and  
7 remediate Protective Order violations by Mr. Ramey after Netflix discovered the violations. Those  
8 efforts included:

- 9 a. On December 30, 2024, notifying Mr. Ramey and the AiPi attorneys of a  
10 first Protective Order violation Netflix discovered in the AiPi productions  
11 from December 27, 2024 (see Ex. I hereto). Mr. Ramey did not respond.  
12 b. On January 21, 2025, notifying Mr. Ramey of additional Protective Order  
13 violations Netflix uncovered in the AiPi productions and demanding the  
14 relief Netflix seeks here: namely, all documents and communications  
15 between Mr. Ramey and AiPi related to this case, and contact information  
16 for AiPi employees who received Netflix's protected information so that  
17 Netflix could remediate Mr. Ramey's violations of the Protective Order. Mr.  
18 Ramey responded on January 23, denying any wrongdoing and asserting the  
19 document identified in Netflix's December 30, 2024 email was sent to AiPi  
20 "in error."  
21 c. On February 4, explaining to Mr. Ramey that Netflix was aware of more  
22 than the purportedly erroneous disclosure referenced in Netflix's December  
23 30, 2024 email and inviting a meet-and-confer; and  
24 d. On February 5, providing Mr. Ramey with specific examples of his  
25 Protective Order violations.

26 19. Mr. Ramey agreed to confer on February 10, 2025. During the conference, Mr.  
27 Ramey explained that he did not have current contact information for the AiPi employees who  
28 received Netflix's protected information, but that he expected he would be able to provide Netflix

1 with his correspondence with AiPi and promised an update to that effect on February 11. Mr.  
2 Ramey did not provide an update on February 11.

3 20. Attached hereto as Exhibit Q is a true and correct copy of an email chain among  
4 counsel for Netflix and William Ramey dated between February 12 and 15, 2025. Netflix continued  
5 to ask Mr. Ramey for a specific date when it would receive the requested communications with  
6 AiPi. Mr. Ramey refused to produce the requested communications.

7 21. Attached hereto as Exhibit R is a true and correct copy of a January 15, 2025  
8 “DECLARATION OF AIPI, LLC CUSTODIAN OF RECORDS,” signed by Eric Morehouse.  
9 Counsel for AiPi provided this declaration to counsel for Netflix on the same day.

10 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true  
11 and correct to the best of my knowledge.

12 Executed on February 18, 2025 in San Francisco, California.

13  
14 /s/ Elise S. Edlin  
15 Elise S. Edlin  
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